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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Service Rules for the 746-764 and 776-794 MHz Bands, and Revisions to Part 27 of the Commission's Rules.	)	WT Docket No. 99-168

To: The Commission

REPLY OF APCO TO OPPOSITIONS TO PETITIONS FOR RECONSIDERATION

The Association of Public-Safety Communications Officials-International, Inc. ("APCO") hereby submits the following Reply to Oppositions to Petitions for Reconsideration of the Commission's *First Report and Order*, FCC 00-5 (released January 7, 2000), in the above-captioned proceeding.

I. Out-of-Band Emissions

APCO's Petition for Reconsideration urges that operations in the 747-762/777-792 MHz band have out-of-band emissions ("OOBE") limits of 87 + 10 log P, rather than 76 + 10 log P, as adopted by the Commission in the *First Report and Order*. The 87 + 10 log P limit had been recommended by Motorola, and supported by extensive documentation in the record. Several parties oppose APCO's Petition, arguing that the requested change would limit potential operations in the 747-762/777-792 MHz band. However, they do not dispute that the 87 + 10 log P level would provide additional interference protection for public safety communications.

Bell Atlantic Mobile, Inc. ("Bell Atlantic") challenges APCO's estimate that there would be a 200 meter coverage hole around a typical commercial transmitter operating at

the 76 + 10 log P level. Instead, Bell Atlantic, citing a Motorola *ex parte* filing, claims that there would be an interference zone of 550 feet in radius at OOBE levels of 65 10 log P, with complete blockage within 270 feet (and 185 feet at 76 + 10 log P). Arguing over the exact size of "coverage holes" at this late stage is not productive, in part due to the large number of variables that make it extremely difficult for any party to make those calculations. However, even assuming the accuracy of the distances cited by Bell Atlantic, there would still be substantial areas of risk.

First, it is the interference zone, not just the point of complete blockage that matters. In an emergency situation, signal degradation can disrupt life-saving communications long before the signal is lost completely. Second, the Commission must also look beyond there being a single coverage hole, and consider that there will be dozens, if not hundreds, of 747-762/777-792 MHz transmitters in a public safety agency's service area. That will result in dozens, if not hundreds, of coverage holes.

Bell Atlantic also creates the false impression that if the antenna height of a transmitter is 100 feet, and the coverage hole based on OOBE limits has a radius of 185 feet, the actual radius of the coverage hole at ground level is only 85 feet. This analysis is flawed, as all of the calculations regarding coverage holes already take antenna height into consideration. The coverage holes are properly measured from the base of the transmitter site, without regard to antenna height. In any event, Bell Atlantic's statement that antenna heights will be more than 100 feet is inaccurate. U S West Wireless, LLC, in its Petition, suggests that at least some antenna heights may actually be less than 30 feet height above average terrain.

II. DTV Transition

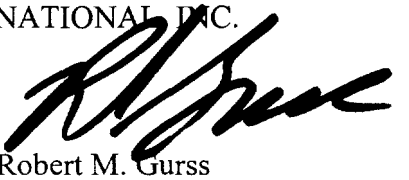
Several parties, including APCO, oppose the petitions for reconsideration from broadcast trade associations which had objected to provisions in the *First Report and Order* allowing broadcasters to relinquish voluntarily their channel 60-69 allotments prior to the end of the DTV transition. Spectrum Exchange Group, LLC, for example, makes several proposals that would potentially speed up the transition process. APCO will not address herein the specifics of those proposals, some of which may require statutory changes. However, APCO takes this opportunity to support efforts by the Commission, broadcasters, new 30 MHz users, guard band managers, the public safety community, and others to develop creative and cooperative mechanisms to encourage more rapid clearing of channels 60-69.

CONCLUSION

For the reasons set forth above, the Commission should urges the Commission to provide additional interference protection for public safety communications, and to take appropriate steps to expedite nationwide availability of the 700 MHz band.

Respectfully submitted,

ASSOCIATION OF PUBLIC-SAFETY COMMUNICATIONS OFFICIALS-INTERNATIONAL, INC.

By: 

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March 17, 2000

CERTIFICATE OF SERVICE

I, Annette M. Mercer, legal secretary in the law office of Shook, Hardy & Bacon, LLP do hereby certify that on this 17th day of March, 2000, a copy of the foregoing document (Reply Of APCO To Oppositions To Petitions For Reconsideration) was mailed, postage pre-paid, to the following:

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